

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jennifer L. McHugh <div style="text-align: right;">Debtor(s)</div>	Chapter 13 Proceeding 19-17879 ELF Claim No. 9-1
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NOTICE OF THIRD FORBEARANCE AGREEMENT DUE TO THE COVID-19 PANDEMIC

Now comes PENNYMAC LOAN SERVICES, LLC ("Creditor"), by and through undersigned counsel, and hereby submits this Notice of Forbearance Agreement to the Court regarding the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor(s) previously requested a forbearance period of 3 months in which the Debtor(s) would not tender mortgage payments to Creditor that would come due on the mortgage starting of April 1, 2020 through June 1, 2020 and an extension of the forbearance period in which the Debtor(s) would not tender mortgage payments to Creditor that would come due on the mortgage starting July 1, 2020 through September 30, 2020. The Debtor(s) recently requested an additional extension of the forbearance period of 3 months in which Debtor(s) will not tender mortgage payments to creditor that will come due starting October 1, 2020 through December 31, 2020. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period after the forbearance plan ends. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect any post-petition escrow shortage. During the forbearance period Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

Because of the uncertainties surrounding how long this pandemic will last, Creditor will work with Debtor(s) or Debtor's counsel to determine when Debtor(s) will be able to resume making mortgage payments and when/how the Debtor(s) will cure the delinquency created by the forbearance period ("forbearance arrears"). Once the forbearance plan ends and the Creditor and Debtor(s) or Debtor's counsel agree on an appropriate repayment or loss mitigation program, Creditor will file a notice or an amended/supplemental claim consistent with local practice.

In the event it is not the intent of the Debtor to extend the COVID-19 forbearance period, upon receipt of notification from the Debtor or Debtor's counsel, the forbearance extension will be cancelled and this notice will be withdrawn.

Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or non-payment of property taxes.

/s/ Sarah K. McCaffery, Esquire

POWERS KIRN, LLC

Jill Manuel-Coughlin, Esquire; ID #63252

Harry B. Reese, Esquire; ID #310501

Sarah K. McCaffery, Esquire; ID #311728

Eight Neshaminy Interplex, Suite 215

Trevoise, PA 19053

Telephone: 215-942-2090; Facsimile: 215-942-8661

Email: bankruptcy@powerskirm.com

Attorney for Movant

Dated: November 6, 2020

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CERTIFICATE OF SERVICE

I, as counsel for PENNYMAC LOAN SERVICES, LLC, hereby certify that a copy of the Notice of Third Forbearance Agreement was served upon the following persons by electronic notification and/or first class U.S. mail, on November 6, 2020:

Parties Served via Electronic Notification:

Jeanne Marie Cella, Esquire
327 West Front Street
P.O. Box 168
Media, PA 19063
Email: paralegal@lawbsc.com
Attorney for Debtor(s)

William C. Miller, Esquire
1234 Market Street, Suite 1813
Philadelphia, PA 19107
Email: ecfemails@ph13trustee.com
Trustee

Parties Serviced via First Class Mail:

Jennifer L. McHugh
103 Mercedes Dr
Aston, PA 19014
Debtor

/s/ Sarah K. McCaffery, Esquire

POWERS KIRN, LLC

Jill Manuel-Coughlin, Esquire; ID #63252

Harry B. Reese, Esquire; ID #310501

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